

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SCANSOFT, INC.,

Plaintiff,

v.

CASE NO. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES,
INC., LAURENCE S. GILICK,
ROBERT S. ROTH, JONATHAN P.
YAMRON, AND MANFRED G.
GRABHERR,

Defendants.

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO OBJECT TO ORDER DISQUALIFYING GOODWIN PROCTER**

Plaintiff ScanSoft, Inc. ("ScanSoft") hereby moves this Court, pursuant to Rules for United States Magistrates Judges in the United States District Court for the District of Massachusetts Rule 2(b), for an extension of time in which to file an objection to the Court's Order, dated April 11, 2006, in which the Court granted defendant Voice Signal Technologies, Inc.'s Motion to Disqualify Goodwin Procter LLP from Representing ScanSoft (the "Order"). In the alternative, in the event this Motion for Extension of Time is denied, ScanSoft hereby provisionally objects to the Order for the purpose of preserving its rights pursuant to 28 U.S.C. § 636(b)(1)(A).

As grounds for this motion, ScanSoft states that it is unable to definitively decide whether to object to the Order, or to submit detailed objections, because the Court has not issued a memorandum explaining a basis for the Order. The Order itself states that a "memorandum will follow"; however, no memorandum has been issued. Therefore, ScanSoft cannot determine whether it has grounds for objection.

Goodwin Procter has ceased all activity in this case, other than in connection with the Motion to Disqualify; however, ScanSoft seeks an opportunity to consider the Court's decision before Goodwin Procter files its Notices of Withdrawal. Accordingly, ScanSoft hereby seeks an extension of time to file an objection until 10 days after the Court issues a memorandum setting forth the basis for the Order.

Respectfully submitted,

/s/ Daniel M. Forman
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Douglas J. Kline (BBO # 556680)
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Counsel for Plaintiff ScanSoft, Inc.

DATED: April 28, 2006

LOCAL RULE 7.1(A)(2) CERTIFICATE AND CERTIFICATE OF SERVICE

I certify pursuant to Local Rule 7.1(A)(2) that the moving party has attempted to confer in good faith with opposing counsel on the matter set forth herein and that opposing counsel has not granted its consent to this motion.

I further certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 28, 2006.

/s/ Daniel M. Forman
Daniel M. Forman